



South Coast Air Quality Management District

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California Department of Transportation,
District 7
100 South Main Street
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Draft Mitigated Negative Declaration/Environmental Assessment (Draft MND/EA) for the Proposed Lost Hills/US-101 Lost Hills Road Overcrossing Replacement & Interchange Modification Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes to widen and replace the existing Lost Hills Road Overcrossing and modification to the Interchange including the bridge and on-and off-ramps located at the U.S. Highway 101 (US-101)/Lost Hills Road Interchange. During project construction, the lead agency estimates that approximately 33 acres of land will be disturbed with no more than 7 acres disturbed on any one day. In addition, soil export of approximately 200 cubic yards per day is expected. The proposed project is estimated to be completed within 18 months with completion estimated beyond 2012.

In the Draft MND, the lead agency has analyzed air quality impacts including daily project operational PM_{2.5} and PM₁₀ impacts and localized CO impacts for 1-hour and 8-hour standards. The lead agency also estimated regional and greenhouse gas (GHG) air quality impacts using the Sacramento Metropolitan Air Quality Management District (SMAQMD) Road Construction Emissions Model. Based on the proposed construction activities, the AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts since it is noted under Existing Setting on page 77 and in Figure 15 of the Draft MND, that several residences are located just north of the proposed project. Therefore, AQMD staff requests that the lead agency evaluate localized air quality impacts¹ to ensure that any nearby sensitive receptors located within one-quarter mile of the project site are not adversely affected by the construction activities that are occurring in close proximity.

¹ Localized Significance Thresholds guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

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In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation that could minimize or eliminate significant air quality impacts pursuant to CEQA Guidelines §15370 in addition to the measures described starting on page 85 of the Draft MND.² Additional comments are included in the attachment.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM
Attachment

LAC120120-06
Control Number

²⁴ Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Construction Air Quality Analysis

1. In the project description, the lead agency mentions export of 200 cubic yards of soil per day but it is not clear where these emissions are accounted for in Table 23 – Short Term Emissions on page 83 or in Appendix A of the Air Quality Report in the Road Construction Emissions Model output sheet. These emission impacts from soil impacts should be accounted for and shown in the Final MND/EA in the narration, a footnote to Table 23 or in the Appendix.

Construction Mitigation Measures

2. In the Draft MND/EA, the lead agency has determined that project construction impacts exceed the SCAQMD recommended significance threshold for NO_x, the AQMD staff recommends the following changes and additional mitigation measures during the projected 18-month construction period in addition to the measures proposed starting on page 85 to further reduce NO_x and any localized impacts, if applicable and feasible.

Recommended Changes:

AQ-6: Develop a dust control plan documenting sprinkling, temporary paving, speed limits (recommend traffic speeds on all unpaved roads to be reduced to 15 mph or less), and expedited revegetation of disturbed slopes as needed to minimize construction impacts to existing communities.

AQ-8: Establish Environmentally Sensitive Areas (ESAs) for sensitive air receptors within which construction activities involving extended idling of diesel equipment would be prohibited, to the extent feasible. Prohibit all vehicles from idling in excess of five minutes, both on- and off-site;

Recommended Additions:

- Require the use of 2010 and newer diesel haul truck (e.g., material delivery trucks and soil import/export). If the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NO_x and PM₁₀ emission requirements.
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EP-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project start to December 31, 2014: All off road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a

Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>
- ✓ Reroute construction haul trucks away from congested streets or sensitive receptors areas.
- ✓ Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- ✓ Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- ✓ Reroute construction trucks away from congested streets or sensitive receptor areas.
- ✓ Limit construction activities such that AQMD thresholds will not be violated, consistent with the lead agency's determination of less than significant impacts.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .